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13 [Additional counsel on signature page.]

14 UNITED STATES DISTRICT COURT  
15 CENTRAL DISTRICT OF CALIFORNIA

16 IN RE SNAP INC.  
17 SECURITIES LITIGATION

Case No. 2:17-cv-03679-SVW-AGR

**CLASS ACTION**

**STIPULATION REGARDING  
VOLUNTARY DISMISSAL  
WITHOUT PREJUDICE OF THE  
UNDERWRITER DEFENDANTS  
PURSUANT TO FED. R. CIV. P.  
41(a)(1)**

Honorable Stephen V. Wilson

22 This Document Relates To: All Actions  
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1       Lead Plaintiff Thomas DiBiase (“Lead Plaintiff”) and Defendants Snap Inc.,  
2 Evan Spiegel, Robert Murphy, Andrew Vollero, Imran Khan, and the Underwriter  
3 Defendants<sup>1</sup> (collectively, “Defendants”), by and through their attorneys, stipulate  
4 and agree as follows:

5       WHEREAS, on November 1, 2017, Lead Plaintiff filed a Consolidated  
6 Amended Class Action Complaint for Violation of the Federal Securities Laws  
7 (“CAC”) (ECF No. 67), alleging claims under Sections 11 (15 U.S.C. §77k) and 12  
8 (15 U.S.C. §77l) of the Securities Act against the Underwriter Defendants;

9       WHEREAS, on June 7, 2018, the Court entered an order denying Defendants’  
10 motions to dismiss the CAC (ECF No. 92);

11       WHEREAS, on August 8, 2018, the Court entered a Civil Trial Preparation  
12 Order, in which it set a trial date of March 12, 2019 (ECF No. 109);

13       WHEREAS, on August 30, 2018, Lead Plaintiff filed a Motion for Class  
14 Certification (ECF NO. 114). The Court has not yet ruled on Lead Plaintiff’s Motion  
15 for Class Certification;

16       WHEREAS, the Underwriter Defendants have answered the CAC, but have  
17 not yet filed a motion for summary judgment;

18       WHEREAS, in order to promote judicial efficiency and to streamline this  
19 litigation, Lead Plaintiff and the Underwriter Defendants have entered into a  
20 “Voluntary Dismissal Agreement,” in which Lead Plaintiff agreed to voluntarily  
21 dismiss the Underwriter Defendants without prejudice, and the Underwriter  
22 Defendants agreed to participate in specified discovery and to specified participation  
23 in the trial in this action;

24       NOW, THEREFORE, Lead Plaintiff and Defendants stipulate and agree that,  
25 pursuant to Fed. R. Civ. P. 41(a)(1), the Underwriter Defendants are voluntarily  
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27       <sup>1</sup> “Underwriter Defendants” means, collectively, Morgan Stanley & Co. LLC,  
28 Goldman Sachs & Co. LLC, J.P. Morgan Securities LLC, Deutsche Bank Securities  
Inc., Barclays Capital Inc., Credit Suisse Securities (USA) LLC, and Allen &  
Company LLC.

1 dismissed without prejudice. This Stipulation does not dismiss Lead Plaintiff's  
2 claims against the other Defendants in this action.

3 **IT IS SO STIPULATED.**

4 Dated: September 18, 2018

**KESSLER TOPAZ  
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*Liaison Counsel for the Putative Class*

1 Dated: September 18, 2018

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17 *Lynton, Stanley Meresman, Scott D.*  
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17 Dated: September 18, 2018

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**ATTESTATION OF FILING**

Pursuant to Local Rule 5-4.3.4 regarding signatures, I, Jennifer L. Joost, hereby attest that the other signatories listed above, on whose behalf this filing is submitted, concur in the filing's content and have authorized the filing.

Dated: September 18, 2018 By: /s/ Jennifer L. Joost

Jennifer L. Joost

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